

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

2.18 - 1429

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

18

1429

I. (a) PLAINTIFFS

AARON FORD

(b) County of Residence of First Listed Plaintiff BURLINGTON
(EXCEPT IN U.S. PLAINTIFF CASES)

THOMAS BRUNO, II, ESQUIRE

(c) Attorneys (Firm Name, Address, and Telephone Number)

ABRAMSON & DENENBERG, P.C.
1315 WALNUT ST., 12TH FLOOR
PHILA., PA. 19107 (215) 546-1345DEFENDANTS UHS RECOVERY FOUNDATION, INC
D/B/A KEYSTONE CENTER AND
UNIVERSAL HEALTH SERVICES, INC.County of Residence of First Listed Defendant MONTGOMERY

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

UNKNOWN

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

PTF	DEF	PTF	DEF
1	X 1	Incorporated or Principal Place of Business In This State	4 4
X 2	2	Incorporated and Principal Place of Business In Another State	5 5
3	3	Foreign Nation	6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input checked="" type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> 425 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> PROPERTY RIGHTS	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability		<input type="checkbox"/> SOCIAL SECURITY	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 190 Other Contract	<input checked="" type="checkbox"/> X 360 Other Personal Injury		<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice		<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 890 Other Statutory Actions
			<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 891 Agricultural Acts
			<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 893 Environmental Matters
			<input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 895 Freedom of Information Act
			<input type="checkbox"/> IMMIGRATION	
			<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 896 Arbitration
			<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
				<input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	FEDERAL TAX SUITS	
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> Habeas Corpus:	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 871 IRS—Third Party	
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence	26 USC 7609	
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General		
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty		
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> Other:		
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other		
		<input type="checkbox"/> 550 Civil Rights		
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

X 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): **28§1332(d) (2)**

VI. CAUSE OF ACTION

Brief description of cause:

SLIP AND FALL ACCIDENT

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION DEMAND \$150,000.00 CHECK YES only if demanded in complaint:
UNDER RULE 23, F.R.Cv.P. NOT IN EXCESS OF JURY DEMAND: Yes 'No

VIII. RELATED CASE(S)
IF ANY

(See instructions):

NONE

JUDGE

DOCKET NUMBER

DATE

MARCH 3, 2018

SIGNATURE OF ATTORNEY OF RECORD

APR - 5 2018

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG/JUDGE

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

18 1429

Address of Plaintiff: **215 PAVONIA CIRCLE, MARLTON, N.J. 08053**

Address of Defendant: **367 S. GULPH ROAD, KING OF PRUSSIA, PA. 19406**

Place of Accident, Incident or Transaction: **KING OF PRUSSIA, PA.**

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?

Yes No

2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?

Yes No

3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?

Yes No

4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

Yes No

CIVIL: (Place in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. Indemnity Contract, Marine Contract, and All Other Contracts
2. FELA
3. Jones Act-Personal Injury
4. Antitrust
5. Patent
6. Labor-Management Relations
7. Civil Rights
8. Habeas Corpus
9. Securities Act(s) Cases
10. Social Security Review Cases
11. All other Federal Question Cases
(Please specify) _____

B. Diversity Jurisdiction Cases:

1. Insurance Contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury (Please specify)
(Please specify) **SLIP AND FALL ACCIDENT**
7. Products Liability
8. Products Liability — Asbestos
9. All other Diversity Cases

I, _____, counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: _____

Attorney-at-Law

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: **3/23/2018**

THOMAS BRUNO, II, ESQ.

Attorney-at-Law

26180

Attorney I.D.#

CIV. 609 (5/2012)

APR - 5 2018

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

AARON FORD

CIVIL ACTION

18

1429

v.

UHS RECOVERY FOUNDATION, ET AL

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x)

MARCH 3, 2018

THOMAS BRUNO, II ESQ.

Date

Attorney-at-law

Attorney for

(215) 546-1345

(215) 546-5355

tbruno@adlawfirm.com

Telephone

FAX Number

E-Mail Address

(Civ. 660) 10/02

APR - 5 2018

**THOMAS BRUNO II, ESQUIRE
IDENTIFICATION NUMBER: 26180
ABRAMSON & DENENBERG, P.C.
1315 WALNUT STREET, 12TH FLOOR
PHILADELPHIA, PA 19107
(215) 546-1345, Ext. 103**

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AARON FORD	:	
215 PAVONIA CIRCLE	:	CIVIL ACTION
MARLTON, NJ 08053	:	
 VS.	:	 JURY TRIAL DEMANDED
 UHS RECOVERY FOUNDATION, INC.	:	
d/b/a KEYSTONE CENTER	:	
367 S. GULPH ROAD	:	NO.
KING OF PRUSSIA, PA 19406	:	
AND	:	
UNIVERSAL HEALTH SERVICES, INC.	:	
561 FAIRTHORNE AVENUE	:	
PHILADELPHIA, PA 19128	:	

COMPLAINT

1. Plaintiff, Aaron Ford, is an adult citizen and resident of the State of New Jersey, residing as captioned.
2. Defendant, UHS Recovery Foundation, Inc. d/b/a Keystone Center, is a corporation, organized and existing under Pennsylvania law, with principal place of business located as captioned.
3. Defendant, Universal Health Services, Inc., is a corporation, organized and existing under Pennsylvania law, with principal place of business located as captioned.
4. The court has subject matter jurisdiction pursuant to 28 § 1332(d)(2) because the amount in controversy exceeds \$75,000.00, exclusive of interest and costs, and this is an action in which plaintiff and defendants are citizens of different states.

5. Venue is proper under 28 U.S.C. §1331(b) because the causes of action upon which the complaint is based arose in Montgomery County, Pennsylvania, which is in the Eastern District of Pennsylvania and defendants', principle place of business is in Montgomery County, Pennsylvania.
6. At all times, relevant hereto, defendants, jointly and/or severally, owned, managed, possessed, controlled, maintained and/or cared for the real property located at 2001 Providence Avenue in Chester, PA. (Hereinafter referred to as "said premises").
7. On Thursday July 21, 2016, between 8:30 a.m. and 9:00 a.m., Aaron Ford, then 29 years old, was a business invitee on said premises.
8. At that date, time and location, the plaintiff, Aaron Ford, was walking into another room to get breakfast, when he was caused to slipped and fall on a wet and slippery floor surface.
9. As a result, plaintiff's legs were caused to slip out from under him and plaintiff fell straight onto his back and head, causing him to temporarily lose consciousness.
10. The condition of the floor was dangerous for people walking through the facility, such as Mr. Ford.
11. Plaintiff fell as a result of the dangerous condition of the floor on said premises, which was due to the carelessness and negligence of the defendants, jointly and/or severally, either individually, or by and through their agents, workmen, independent contractors and/or employees.
12. This accident resulted from the negligence and carelessness of the defendants, and was not due to any act or failure to act on the part of the plaintiff.

13. The hazardous and dangerous condition in question consisted of a wet floor of the defendants' facility, which created an unreasonable and unsafe hazard to invitees, such as the plaintiff.
14. The defendants had a duty to promptly repair or remediate any hazardous, unsafe and dangerous condition, including drying any water or putting down mats on the floor in their custody and/or control.
15. The defendants had actual and/or constructive notice of the existence of said hazardous, unsafe and/or dangerous condition prior to the happening of the accident.
16. The defendants had a reasonable opportunity to correct the hazardous, unsafe and dangerous conditions prior to the happening of the accident.
17. Notwithstanding the above, on the aforesaid date, the defendants did carelessly and negligently allow the floor to remain in a dangerous, hazardous and unsafe condition.
18. The carelessness and negligence of the defendants, included, but was not limited to, committing and/or allowing to be committed the following:
 - a. Creating and/or allowing a dangerous and unsafe condition;
 - b. Failing to adequately warn plaintiff of the dangerous and unsafe condition of said floor;
 - c. Failing to inspect and properly maintain and/or repair the hazard of the real estate of the floor;
 - d. Failing to correct a dangerous and unsafe condition of which defendant knew or should have known;
 - e. Failing to provide and ensure for the proper maintenance of said floor by drying the water on it or placing mats down for the safety of business invitees;
 - f. Failing to have proper procedures to discover and correct hazardous conditions related to the floor; and

g. Failing to protect the plaintiff from said dangerous and unsafe condition of the floor.

19. As a direct result of the above, the plaintiff sustained serious injuries, and/or aggravations thereto, some of which may be permanent, including, but not limited to:

- a. Neck strain;
- b. Cervical strain;
- c. Thoracic strain/sprain; and
- d. Central non-stenotic disc herniations at C3-4 and C4-5.

20. As a further result of the above, the plaintiff has suffered agonizing aches and physical pains, disability, anguish and humiliation, and will continue to suffer for an indefinite time in the future, to plaintiff's great detriment and loss.

21. As a further result of the above, the plaintiff has incurred various expenses for medical treatment, and may be obliged to continue to incur additional such expenditures for an indefinite time in the future, to plaintiff's great detriment and loss, which expenses to date include, but are not limited to:

Crozer EMS	
7/21/16	\$1,136.00
Crozer-Chester Medical Center	
7/21/16	\$6,469.00
Injury Rehabilitation Center	
12/22/16 – 2/14/17	\$6,107.15
Advanced Diagnostics	
MRI Thoracic Spine	
1/3/17	\$4,166.00
Komfort & Kare	
1/5/17	\$1,676.50
1/20/17	\$126.00
	+ _____
TOTAL	\$19,680.65

22. As a result of the actions of the defendants, UHS Recovery Foundation, Inc. d/b/a Keystone Center and Universal Health Services, Inc., the plaintiff, Aaron Ford, has and will hereafter incur other financial expenses and losses.

23. As a further result of the careless and negligent actions of the defendants, the plaintiff, Aaron Ford, has suffered a severe loss of earnings and impairment of earning capacity and power may continue for an indefinite time in the future to his great detriment and loss.

WHEREFORE, the plaintiff, Aaron Ford, demands judgment against the defendants, UHS Recovery Foundation, Inc. d/b/a Keystone Center and Universal Health Services, Inc., for an amount not in excess of One Hundred and Fifty (\$150,000.00) Dollars plus costs, interest, attorney's fees and delay damages.

ABRAMSON & DENENBERG, P.C.

BY: _____

~~THOMAS BRUNO II, ESQUIRE~~
~~IDENTIFICATION NUMBER: 26180~~
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1315 WALNUT STREET, 12TH FLOOR
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